

Appl. No. 10/064,595
Amdt. dated May 17, 2005
Reply to Office action of March 03, 2005

REMARKS

1. Drawings:

5 Attached are replacement sheets for Figs.1 and 2 with the designation "Related Art", which has been previously permitted by the USPTO as an alternative to "Prior Art".

Consideration of the corrected Figs.1 and 2 is respectfully
10 requested.

2. Rejection of claims 1-12 under 35 U.S.C. 112(a)

The applicant argues that the "sorting pointers" are clearly and
15 fully described in the specification, given that pointers (e.g. memory pointers) are well known in the field of computers.

In claim 1, the limitation of

20 "a plurality of distinct sorting pointers, each distinct sorting pointer representing a unique priority;"

is supported by specification paragraph [0024] reciting

25 "Each sorting pointer In1-In4 represents a different priority..."

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and by Fig.3 illustrating four unique pointers In1-Id4.

In claim 1, the limitation of

5 "a plurality of configuration tables, each configuration
table for corresponding one predetermined identity to one
unique sorting pointer, and each configuration table
having at least a unique predetermined identity which
corresponds to a sorting pointer;"

10 is supported by specification paragraph [0024] which recites

15 "...and each configuration table C1-C4 corresponds
different predetermined identities of wireless networks
to different sorting pointers In1-In4",

and by the illustration of the configuration tables T1-T4 in
Fig.3.

20 Lastly, in claim 1, the limitation of

 "choosing an identity according to the sorting pointer
corresponding to the status pointer;"

25 is supported by specification paragraph [0024] which further
recites that the "sorting pointers" are linked to priorities in

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"In Fig.3, the sorting pointer In1 represents the highest priority, and the sorting pointer In2 represents the second highest priority, and so on."

- 5 and by paragraph [0026] which states that choosing an identity and thus a network is done according to priorities

10 "The terminal STA0 will try to connect to the wireless network with the highest priority in the configuration table. If the terminal STA0 cannot connect to the wireless network, and it will then try to connect to the wireless network with the second highest priority in the configuration table, and so on."

- 15 Based on the above, the applicant argues that the specification fully supports the claims, and further that the specification describes the "sorting pointers" sufficiently for one of ordinary skill in the art to understand what they are given in light of commonly known computer memory pointers.

20

Withdrawal of this rejection is respectfully requested.

- 25 3. Rejection of claims 1-12 under 35 U.S.C. 103(a) as being unpatentable over Russell (US20040249915) in view of Mahalingaiah (US6754214):

Regarding claim 1:

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The applicant argues that the combination does not teach or suggest the claimed limitation of "a plurality of configuration tables".

- 5 The Examiner has considered Russell's Figs. 2C-E to show a "a plurality of configuration tables," however, clearly Russell uses only one such priority table (that of Fig. 2E). The remaining tables in Figs. 2C-D appear to only further define the CN entries of the table of Fig. 2E. The tables of Figs. 2C-E are not
10 independent as a simple plurality should be, but rather they are highly interrelated and interdependent.

- Russell's priority table (Fig. 2E) is configured by the user during setup, after which an algorithm is used to automatically
15 combine the priority table's information, along with GPS information (which gives the user's immediate geographic location) and other information (such as a list of the user's contracted networks), to select a network to use. Russell's disclosure of using GPS to automatically track the user's
20 location and available networks negates any need for multiple priority tables, which supports that argument that Russell does not actually disclose "a plurality of configuration tables".

- Mahalingaiah's multiple mapping tables are for distinguishing
25 between packets of information that contain separate security, identification, and priority codes in their headers (col. 20 lines 53-63). Mahalingaiah does not teach or suggest the claimed "plurality of configuration tables," specifically the claimed

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table of prioritized identities.

The claimed "plurality of configuration tables" are also not suggested by the cited art. One could argue that a single element
5 teaches a plurality, however, Russell is far from suggesting a plurality since Russell's disclosure, when considered as a whole, obviates the need or desire for more than one table. Simply put, Russell does not suggest how more than one table of Fig. 2E would be useful in any way.

10

Since all limitations of a claim must be taught or suggested by the combination for an obviousness rejection to stand, the applicant respectfully requests that this rejection to claim 1 be withdrawn.

15

Lastly, the Examiner's stated motivation for this combination is unclear to the applicant. When viewed as a whole, Russell and Mahalingaiah's disclosures are significantly different regarding priorities: Russell prioritizes network connections
20 while Mahalingaiah's packets each have a priority. Since tables of priorities are a central issue in this rejection, the applicant asserts that the combination may have been made with an undue amount of hindsight.

25 **Regarding claim 10:**

Russell does not mention randomly selecting an identity when none of the received identities can be found in a table. The cited

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section of Russell (page 7, 0079) teaches that on no match the boundaries of the existing networks are changed "providing a more accurate view of the device's coverage areas."

- 5 Since all limitations of a claim must be taught or suggested by the combination for an obviousness rejection to stand, the applicant respectfully requests that this rejection to claim 10 be withdrawn.

10 **New claim 13:**

- Claim 13 is introduced and is dependent on claim 1. It is fully supported by the original disclosure, and particularly by Fig. 3. Claim 13 is aimed at narrowing claim 1 with respect to the
15 type of data within the configuration tables. Neither Russell nor Mahalingaiah teach or suggest "each configuration table corresponds to a unique list of prioritized user preferences for a specific operational time and physical location of the terminal." In contrast, Russell's single table contains
20 automatically updated priorities and Mahalingaiah's tables are completely different in structure.

- Consideration of this new claim is respectfully requested. Since it merely narrows and refines previously presented limitations,
25 a new search or additional consideration by the Examiner should not be required.

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Further differences:

The claim 1 step of

- 5 "comparing the predetermined identity of the chosen
configuration table with the identities received, and if
any of the plurality of identities received matches the
predetermined identity, then choosing an identity
according to the sorting pointer corresponding to the
10 status pointer;"

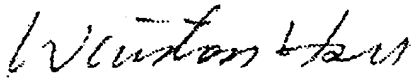
is another limitation that distinguishes the invention from the
cited art. This step relies on how the configuration tables and
pointers are defined. As mentioned above, since the plurality
15 of configuration tables are significantly different from the
cited art, this step also has distinct meaning. Neither Russell
nor Mahalingaiah teach or suggest choosing an identity (i.e. a
network to connect to) according to the sorting pointer (i.e.
a priority) corresponding to the status pointer (i.e. an
20 operational location and time).

Conclusion:

Withdrawal of the rejection to claims 1-12 is requested in view
25 of the above arguments. Consideration of new claim 13 is also
requested.

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Respectfully submitted,



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- 10 Note: Please leave a message in my voice mail if you need to talk to me. The time in D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan).